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FIRM and AFFILIATE OFFICES

CHRISTOPHER H. CASEY  
DIRECT DIAL: +1 215 979 1155  
PERSONAL FAX: +1 215 689 2194  
E-MAIL: CHCasey@duanemorris.com

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November 25, 2020

**MEMO ENDORSED**

**VIA ECF**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1910  
New York, NY 10007


**Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, Case No. 1:20-cv-706 (DLC)**

Dear Judge Cote:

On behalf of Martin Shkreli, I hereby respectfully request permission to file under seal a portion of Mr. Shkreli's Memorandum of Law in Support of His Motion to Stay Discovery (the "Memorandum of Law"), portions of Jack T. Donson's Declaration in Support of Mr. Shkreli's Motion to Stay Discovery (the "Donson Declaration"), and a portion of Exhibit A-5 to the declaration of Kandis Kovalsky (the "Exhibit"). Pursuant to the Court's September 17, 2020 Order (ECF No. 261), I respectfully provide the Court with the reason for the requested redactions in Mr. Shkreli's Memorandum of Law, in the Donson Declaration, and in the Exhibit. The requested redactions contain personal and confidential information pertaining to Mr. Shkreli that is not related to the claims or defenses in this case, has not been released into the public domain, and would be likely to cause significant personal embarrassment if publicly filed. The sealing of this information is necessary to preserve the higher values of protecting personal confidential information of Mr. Shkreli, and thus, sealing the portions of the Memorandum of Law, the Donson Declaration, and the Exhibit is narrowly tailored to achieve the aim of preserving such higher values.

In accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Mr. Shkreli will publicly file the Memorandum of Law, the Donson Declaration, and the Exhibit with the redactions, and on a separate docket entry, Mr. Shkreli will file under seal the unredacted Memorandum of Law, Donson Declaration, and Exhibit.

Granted.  
11.30.2020

  
DENISE COTE  
United States District Judge

Respectfully submitted,

/s/ Christopher H. Casey  
Christopher H. Casey

Duane Morris

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November 25, 2020  
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